

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

WALTER CHOW, as Administrator of the Estate of LEROY CHOW, individually and on behalf of all others similarly situated,

Plaintiff,

v.

SHOREFRONT OPERATING LLC d/b/a SEAGATE REHABILITATION AND NURSING CENTER; SHAINDY BERKO; ROCHEL DAVID; LEAH FRIEDMAN; DEENA LANDA; ESTHER FARKOVITZ; AVI PHILIPSON; BERISH RUBINSTEIN; DAVID RUBINSTEIN; BRUSCHA SINGER; JOEL ZUPNICK; SHOREFRONT REALTY LLC; SENTOSACARE, LLC; and DOES 1-25,

Defendants.

Civil Action  
No. 1:19-cv-03541-FB-SJB

**NOTICE OF MOTION  
FOR LEAVE TO FILE AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that plaintiff Walter Chow, as the Administrator of the Estate of Leroy Chow, individually and on behalf of all others similarly situated, moves the Court to grant him leave to file an amended class action complaint pursuant to Rules 15, 20(a)(2), and 21 of the Federal Rules of Civil Procedure. This motion is based upon this notice of motion, the accompanying memorandum of points and authorities, the declaration of John D. Sardesai-Grant, and exhibits thereto. The grounds for this motion are set forth in the accompanying Memorandum in Support, which is incorporated fully herein.

Dated: Brooklyn, New York  
September 18, 2020

Respectfully Submitted,

**FINKELSTEIN, BLANKINSHIP,  
FREI-PEARSON & GARBER, LLP**

By: /s/John D. Sardesai-Grant

D. Greg Blankinship  
Jeremiah Frei-Pearson  
John D. Sardesai-Grant  
One North Broadway, Suite 900  
White Plains, New York 10601  
Tel: (914) 298-3281  
[gblankinship@fbfglaw.com](mailto:gblankinship@fbfglaw.com)  
[jfrei-peerson@fbfglaw.com](mailto:jfrei-peerson@fbfglaw.com)  
[jsardesaigrant@fbfglaw.com](mailto:jsardesaigrant@fbfglaw.com)

*Attorneys for Plaintiff and the Putative Class*

To:

Lori Semlies, Esq.  
**WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP**  
150 East 42nd Street  
New York, New York 10017  
Tel.: 212-490-3000 ext.2390  
[lori.semlies@wilsonelser.com](mailto:lori.semlies@wilsonelser.com)

David Ross, Esq.  
**WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP**  
1500 K Street, Suite 330  
Washington, DC 20005  
Tel.: 202-626-7660  
[david.ross@wilsonelser.com](mailto:david.ross@wilsonelser.com)

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that on the 18th day of September, 2020, I caused a true copy of Plaintiff's Motion For Leave To File An Amended Class Action Complaint and accompanying Memorandum in Support, Declaration, and Exhibits to be served by the Court's CM/ECF system upon counsel for Defendants.

By: /s/John D. Sardesai-Grant  
John D. Sardesai-Grant  
**FINKELSTEIN, BLANKINSHIP,  
FREI-PEARSON & GARBER, LLP**  
One North Broadway, Suite 900  
White Plains, New York 10601  
Tel: (914) 298-3281  
jsardesaigrant@fbfglaw.com